

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CHARLES LANGONE, as FUND MANAGER)
of the NEW ENGLAND TEAMSTERS AND)
TRUCKING INDUSTRY PENSION FUND,)
)
Plaintiff,)
) C.A. No. 05-11566 GAO
v.)
)
GUARDRAIL, INCORPORATED)
)
Defendant)
)

**AFFIDAVIT OF CATHERINE M. CAMPBELL IN SUPPORT
OF AWARD OF ATTORNEY'S FEES AND COSTS PURSUANT TO
SECTION 502(g)(2) OF ERISA, 29 U.S.C. § 1132(g)(2)**

Catherine M. Campbell deposes and says as follows:

1. I am an attorney associated with the law office of Feinberg, Campbell & Zack, P.C., located at 177 Milk Street, Boston, MA 02109. I am admitted to practice before the United States District Court for the District of Massachusetts, the United States District Court for the Northern District of California, the United States Court of Appeals for the First Circuit, the Massachusetts Supreme Judicial Court, and the California Supreme Court. I specialize in litigation under the Employee Retirement Income Security Act of 1974 (ERISA) and the Multiemployer Pension Plan Amendments Act of 1980 (MPPAA). I have acted as legal representative of the New England Teamsters and Trucking Industry Pension Fund ("Pension") for the purposes of the above-captioned matter.

2. The amount of time this office has expended in pursuing collection of pension contributions due and owing the Pension Fund from the Defendant Guardrail, Inc. has

been 3.25 hours. Pursuant to financial arrangements made by this office with the Fund, services are charged at the rate of \$235.00 per hour. Accordingly, the amount of legal fees incurred by the Pension Fund as a result of the work performed by this office is \$1,292.50 and the total amount of costs incurred is \$261.50 as set forth in the attached itemized Detail Transaction File List.

3. The total of attorneys fees and costs incurred by the Pension Fund are \$1,554.00.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 7th DAY OF DECEMBER 2005.

/S/ Catherine M. Campbell
Catherine M. Campbell
BBO #549397
Feinberg, Campbell & Zack, P.C.
177 Milk Street
Boston, MA 02109
(617) 338-1976

	<u>Client</u>	<u>Trans Date</u>	<u>H P</u>	<u>Tcd</u>	<u>Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>	<u>Ref #</u>
Fees								
	200.265	08/17/2005	7 A	1	235.00	1.50	352.50	New referral- reopen file; Preparation of Demand letter New England Teamsters & Trucking Industry Guardrail, Inc.
	200.265	10/13/2005	7 A	1	235.00	3.25	763.75	Preparation of Request for Default; Telephone conference with Fund office; Research regarding withdrawal liability, Update litigation report New England Teamsters & Trucking Industry Guardrail, Inc.
	200.265	11/30/2005	7 U	1	235.00	0.75	176.25	Preparation of Motion for Entry of Default Judgment New England Teamsters & Trucking Industry Guardrail, Inc.
	Total for Fees			Billable	5.50		1292.50	
Advances								
	200.265	07/25/2005	7 A	114			250.00	Filing Fees/ (38) Clerk, US District Court New England Teamsters & Trucking Industry Guardrail, Inc.
	200.265	07/25/2005	7 A	117			11.50	Courier/Messenger Service (1115) City Express to US District Court New England Teamsters & Trucking Industry Guardrail, Inc.
	Total for Advances			Billable	0.00		261.50	
	GRAND TOTALS							
				Billable	5.50		1554.00	